

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

RACHEL RAMSBOTTOM, ET AL.,)	
)	
Plaintiffs,)	Civil No. 3:21-cv-00272
)	
v.)	JUDGE TRAUGER
)	
LORIN ASHTON,)	
)	
Defendant.)	

DEFENDANT LORIN ASHTON’S MOTION FOR SUMMARY JUDGMENT

Defendant Lorin Ashton (“Defendant”) respectfully moves this Court pursuant to Rule 56 of the Federal Rules of Civil Procedure for an order dismissing the First Amended Complaint (“FAC”) filed by plaintiffs Rachel Ramsbottom (“Ramsbottom”), Alexis Bowling (“Bowling”), and Jenna Houston (“Houston”)¹ against him in its entirety, with prejudice.

Defendant submits that Plaintiffs cannot meet their burden, as a matter of law, to prove that Defendant violated 18 U.S.C. Section 1591 and thus, Counts I and II of the FAC, brought pursuant to 18 U.S.C. Sections 1591 and 1595, for violations of the Trafficking Victim Protection Reauthorization Act must be dismissed with prejudice. Plaintiffs have similarly failed to establish that Defendant knowingly solicited, manufactured, received or possessed any child pornography of the Plaintiffs, thus cannot prove that Defendant has violated 18 U.S.C. Sections 2252 and 2252A and as such, Count III of the FAC must be dismissed with prejudice. Finally, Count IV of the FAC — Ramsbottom’s negligence per se claim is barred as a matter of law and must be dismissed with prejudice.

¹ Ramsbottom, Bowling and Houston are collectively referred to as “Plaintiffs.”

Ashton also files his Memorandum of Law in Support of this Motion for Summary Judgment, his Rule 56.1 Statement of Undisputed Material Facts, the Declaration of Kimberly S. Hodde, dated October 3, 2024, and the exhibits thereto, and the Declaration of Eric Collier, all of which he incorporates by reference.

For the foregoing reasons and for those reasons outlined in his Memorandum of Law in Support of his Motion for Summary Judgment, Ashton respectfully requests that the Court dismiss the First Amended Complaint against him in its entirety with prejudice.

Dated: October 3, 2024

Respectfully Submitted,

s/ Robert A. Peal
Robert A. Peal (#025629)
SIMS|FUNK, PLC.
3102 West End Ave., Suite 1100
Nashville, TN 37203
(615) 292-9335
rpeal@simsfunk.com

Kimberly S. Hodde
HODDE & ASSOCIATES
40 Music Square East
Nashville, TN 37203
(615) 242-4200
kim.hodde@hoddelaw.com

Mitchell Schuster (admitted *pro hac vice*)
Stacey M. Ashby (admitted *pro hac vice*)
Richard J. Jancasz (admitted *pro hac vice*)
MEISTER, SEELIG & FEIN, LLP
125 Park Avenue, 7th Floor
New York, NY 10017
(212) 655-3500
ms@msf-law.com
sma@msf-law.com
rj@msf-law.com

Attorneys for Defendant Lorin Ashton

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and exact copy of the foregoing was served on the following counsel via the Court's CM/ECF system and/or electronic mail on this 3rd day of October, 2024:

James Gerard Stranch, IV
Robert Bruce Grayson K Wells
STRANCH, JENNINGS & GARVEY, PLLC
223 Rosa L. Parks Avenue
Suite 200
Nashville, TN 37203
jstranch@stranchlaw.com

M. Stewart Ryan
Alexandria MacMaster
LAFHEY, BUCCI D'ANDREA REICH & RYAN
1100 Ludlow Street
Suite 300
Philadelphia, PA 19107
sryan@laffeybucci.com
amacmaster@laffeybucci.com

Attorneys for Plaintiffs

*s/ Robert A. Peal*_____